

THE QUINN LAW FIRM

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MEMO ENDORSED

January 3, 2024

VIA ECF and Facsimile

The Honorable Nelson S. Roman
Southern District of New York
Charles L. Brieant United States Courthouse
300 Quarropas Street
White Plains, New York 10601
(f) (914) 390-4179

Re: **Jones v. City of Mount Vernon, et al.**
Docket No: 22-cv-00414 (NSR)(AEK)

Dear Judge Roman:

As the Court is aware, The Quinn Law Firm, PLLC represents all named Defendants and Rickner PLLC represents Plaintiff in the above-referenced matter.

The parties jointly write to respectfully request that the Court adjourn the telephonic post-discovery Case Management Conference scheduled for tomorrow, January 4, 2024, to a date after the close of discovery. The parties respectfully propose April 11, April 12, or April 18, 2024 as mutually agreeable alternative conference dates.

The reason for this request is that on December 13, 2023 the discovery deadlines in this case were extended, upon the parties' application, by Magistrate Judge Krause. The current discovery deadlines are as follows: fact discovery is to be completed by January 31, 2024; expert reports are to be completed by February 5, 2024; rebuttal reports are to be completed by March 5, 2024; expert depositions are to be completed by April 5, 2024; and all discovery is to be completed by April 8, 2024. (D.E.'s 39, 40). This is the first request for an adjournment of the Case Management Conference.

We thank the Court for its time and attention to this matter. We also apologize for the last-minute nature of this request and for any inconvenience caused to the Court by the tardiness of this application.

Respectfully submitted,

Steven Bushnell

Steven J. Bushnell, Esq.

Rob Rickner


Rob Rickner, Esq.

In light of the extension of the discovery deadlines, the parties' request to adjourn the Status Teleconf. from Jan. 4, 2024 until May 1, 2024 at 10:00 am is GRANTED. Counsel are directed to this Court's Order at ECF No. 30 for dial-in instructions. Clerk of Court is requested to terminate the motion at ECF No. 41.

Dated: White Plains, NY

January 4, 2024

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

USDC SDNY
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